



Mel Carnahan, Governor • Stephen M. Mahfood, Director

# DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

## MEMORANDUM

DATE: **JUL 14 1999**

TO: Air Pollution Control Program Policy Manual

FROM: Roger D. Randolph, Director   
Air Pollution Control Program

SUBJECT: Clarification of Charcoal Kiln Performance Testing Rule

All batch-type charcoal kilns are now regulated under 10 CSR 10-6.330 and will be required to conduct performance tests to demonstrate compliance with emission limitations set forth in this rule. Kiln emissions will be controlled through the use of an afterburner or thermal oxidizer to meet emission limitations on particulate matter, carbon monoxide and volatile organic compounds. Performance tests to demonstrate compliance with these limitations are required by 10 CSR 10-6.330(3)(F) and states that, "...each charcoal kiln of the system (be) filled to at least...90% of fill capacity and (tested) at the midpoint of (the) burn cycle unless otherwise noted." The midpoint of the burn cycle is defined as, "...no less than...40% and no more than...60% of the total burn cycle."

Many new kiln control systems connect three or more charcoal kilns to a single afterburner in order to more effectively use the afterburner control system. During normal production, the kilns are run in a staged fashion with the result that all kilns are never at the midpoint of their burn cycle at the same time. In order to meet the intent of the testing requirements of 10 CSR 10-6.330(3)(F), the Air Pollution Control Program (APCP) will allow testing of the kiln system only under conditions which represent the maximum potential for emissions consistent with normal facility operations. These conditions may include (but are not limited to) the following: maximum quantity of wood per kiln; maximum number of kilns on-line to afterburner; minimum number of kilns cooling, loading, or unloading; maximum number of kilns at mid-point of burn cycle.

A pre-test plan must be submitted to and approved by the APCP to allow testing under staged operating conditions. This policy will not effect any other provisions of 10 CSR 10-6.330, and all batch-type charcoal kilns must still comply with all other requirements of this rule.

RDR:ebb